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PROCUREMENT MANAGEMENT REVIEWS; AN ANALYSIS
OF THE MOST RECURRING DISCREPANCIES FOR
SMALL PURCHASE OPERATIONS

by

Basil F. Gray III

June 1990

Thesis Advisor:

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Procurement Management Reviews; An Analysis of
the Most Recurring Discrepancies for
Small Purchase Operations

by

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ABSTRACT

Various Naval Field Activities are granted procurement authority from the Naval Supply Systems Command (NAVSUP) or Naval Regional Contracting Centers (NRCC). The granting activities (NAVSUP or NRCC) are required to do periodic reviews of these activities in order to ensure that the rules, regulations and proper procedures are being followed. During these Procurement Management Reviews (PMR) many of the same discrepancies continue to appear. This thesis analyzes 50 PMRs conducted by NRCC, San Diego, in 1989. It reveals 16 common discrepancies, discusses why buyers and reviewers felt they occurred and recommends actions that will reduce their occurrence.



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I. INTRODUCTION

A. PURPOSE OF THE RESEARCH

Department of Defense Directive 5126.34, Defense Procurement Management Review Program, directs each Service to develop and conduct a program of periodic reviews of their contracting and contract management organizations. This program was established to ensure that activities are following the rules, regulations and prescribed procedures. This formal review system is known as Procurement Management Review (PMR).

The Commander, Naval Supply Systems Command (COMNAVSUP), in response to this directive, established a PMR program as the basic method by which the procurement operations of all Navy Field Contracting System (NFCS) activities are to be uniformly and comprehensively reviewed, assessed and reported. The NAVSUP PMR program is also the means by which COMNAVSUP, as Head of the Contracting Activity (HCA) for NFCS, grants field procurement authority. This is done by assigning PMR responsibility to NAVSUP Commands and their Detachments to provide HCA review and oversight of the NFCS under their cognizance. [Ref. 1:p. 2]

The periodic reviews of these Navy Field Activities (NFA) has revealed that many of the same discrepancies continue to appear on PMR reports. Until now, no formal analysis of these

reports has been conducted to determine which discrepancies are the most common, why they persist and if they can be prevented.

The purpose of this research effort is to review the PMRs that were conducted by the Naval Regional Contracting Center (NRCC), San Diego, CA., in 1989 and categorize the most common discrepancies, why they occur and recommend possible solutions to prevent their recurrence. The final data and recommendations will be used to better help commands meet their mission need, respond to customer requirements and identify systematic problems with the NFCS.

B. RESEARCH QUESTIONS

The following research questions were addressed during this study.

1. Primary Research Question

What are the most common discrepancies found during Procurement Management Reviews (PMR) at Navy small purchase buying activities?

2. Subsidiary Research Questions

- * What is the purpose of a PMR?
- * How are PMR discrepancies corrected?
- * Why do the discrepancies occur (in the opinion of buyers and PMR inspectors)?
- * What can be done to correct recurring discrepancies?

C. RESEARCH METHODOLOGY

The research methodology used during this study consisted of three primary efforts.

1. Literature Review

Literature related to the PMR and/or procurement issues was obtained from the Dudley Knox Library, the Department of Administrative Sciences Library at the Naval Postgraduate School, the Department of Defense, U.S. Navy, Directives systems and various purchasing activities.

2. Analysis of PMRs conducted in 1989 by NRCC, San Diego

The results from all the PMRs conducted by NRCC, San Diego in 1989 were the source of all the analytical data for this study. Each PMR was thoroughly reviewed and the discrepancies were identified by their corresponding procurement regulation. These discrepancies were consolidated into the standard PMR review areas and then counted to determine their frequency of occurrence. For purposes of analysis, discrepancies that had a reoccurring trend was considered to be relevant to this study and the basis of recommended solutions.

3. PMR Team, Buyer and Procurement Manager's Feedback

Personal and telephone interviews were conducted with PMR inspectors, buyers and procurement managers. The information gathered during these interviews was used as a supplement to the literature review and the PMR reports. Their insight was invaluable in understanding the operational

process and necessary to establish conclusions and recommendations.

D. SCOPE, LIMITATIONS AND ASSUMPTIONS

This study specifically analyzed the West Coast PMRs that were conducted by the NRCC, San Diego, CA., in 1989. These activities are strictly small purchase (buying authority less than \$25,000) operations.

E. CONCLUSION AND INTRODUCTION TO FOLLOWING CHAPTERS

This chapter has provided some background information on the purpose of the research, the research questions and the methodology that was employed for this thesis. Chapter II expounds on this background in order to provide an understanding of the significance of PMRs within DoD. It presents a brief overview of the history, development and procedures of PMRs within DoD and the Naval Supply Systems Command.

Chapter III discusses the detailed methodology used in analyzing 50 PMRs conducted by NRCC, San Diego, in 1989. It provides the interview questions and a consolidation of the buyer's and inspector's responses.

The final chapter gives the conclusions and recommendations of the researcher. Included in this chapter are the answers to the primary and subsidiary research questions and a summary of findings.

II. PMR PROCESS

A. HISTORICAL PERSPECTIVE

The Defense Procurement Management Review Program was established by the Secretary of Defense on July 30, 1962. This program was a continuation of a 1961 study that was initiated to answer congressional concerns about the Office of Secretary of Defense's (OSD) control over procurement policy implementation. The study revealed that there was no uniform approach to procurement management within the Department of Defense (DoD), which made it difficult to evaluate the effectiveness of the Military Departments in discharging their procurement responsibilities. As a result they recommended that OSD develop a procurement management review program to discharge these duties. [Ref. 2:p. 1]

OSD, the Military Departments and the Defense Logistics Agency (DLA) were allocated approximately 70 personnel billets and given a charter to develop a standardized instruction manual that could be used to ensure consistency in performance criteria and inspection procedures. This program was under the cognizance of the then Assistant Secretary of Defense (Installation and Logistics), and individual reviews were conducted by experienced procurement personnel assigned to the Military Departments and DLA. [Ref. 3:p. 2]

By July 1966, DoD Directive 5126.34 expanded the program requirement to cover contract administration functions and required a three-year review cycle for major procurement organizations. [Ref. 3:p. 4] In August 1977 the directive was revised to designate DLA as the DoD Executive Agent for the program. Additionally, the Military Departments were responsible for organizing and conducting reviews with in-house personnel and assets located within their respective headquarters.

The Naval Supply Systems Command (NAVSUP), as a Head of Contracting Activity (HCA) has assigned its PMR responsibilities to tenant commands and detachments. One of these commands is Naval Regional Contracting Center (NRCC), San Diego, which has review and oversight of over 185 Navy Field Contracting System (NFCS) activities. [Ref. 1:p. 2]

B. NAVSUP PMR PROCEDURES

NAVSUP Instruction 4200.82 is the primary guidance for the Procurement Management Review program of the Navy Field Contracting System. It provides definitions and background information, assigns responsibilities and establishes procedures for conducting PMRs.

The PMR process begins with a notification letter to the activity at least one month prior to the review. The letter identifies the name of the cognizant team leader and requests procurement information for the past three fiscal years. The

information should be reviewed by the team prior to conducting a PMR and may include the following:

(1) Number and dollar value of awards for both small purchase and contractual actions.

(2) Number and dollar value of awards to small business and 8(a) program concerns.

(3) One time grants of contracting authority beyond the assigned level(s).

(4) A breakdown of each purchase method used, within the past year, showing the number and dollar value of each category.

(5) A listing of the organization's key contracting personnel which should include each person's name, title, military or civil service grade, education level attained, and procurement courses completed within the past five years. The listing should note contracting officer and ordering officer appointments with limitations, if any.

(6) Copies of approved procurement initiatives under the Model Installation Program (MIP), the Model Installation Extension Program (MIEP), and the Pilot Contracting Activities Program (PCAP).

(7) Contract administration data on retained contracts, including:

(a) The number and dollar value of all contracts currently being administered, if available.

(b) Contract number and dollar value of the ten largest contracts currently being administered; and

(c) Contracting Officer Technical Representative (COTR) listing to include name, contract number and training record.

(8) Copies of the contracting office's organization manual and all contracting and contracting related instructions. Less formal implementing procedures, instructions and memoranda should be made available to the team upon arrival.

(9) Copies of local contracting and contracting related forms.

(10) Work in process reports to include number and age of actions by buyer, negotiator and division.

(11) Description of the activity's Management Information System (MIS) and copies of recently generated reports.
[Ref. 1:Encl. 1]

At the beginning of the on-site review, the team leader explains the review procedures and addresses the major evaluation factors to the activity's Commanding Officer. Then the PMR team begins its working schedule that consists of the following phases, as applicable:

- * Review procurement and related files and conduct interviews with legal counsel, customers, buyers, etc.
- * Examine procurement and contract administration areas.
- * Identify problem areas that affect the integrity and effectiveness of the procurement function and recommend ways to improve the buying activity's support of mission capability, response to customer needs, and integrity of the procurement function.
- * Provide training as time permits.

During this review process, the team uses a checklist similar to the one in Appendix A to guide them in their analysis.

Upon completion of the review, the activity is provided a written report of the team's findings. The report is in a standard format that gives a general description of the findings, followed by a detailed discussion with specific examples and a final section which provides recommendations to correct the problem.

This report also states the team's overall assessment of an activity's performance by a rating of satisfactory, marginal or unsatisfactory. Activities that receive a rating

of unsatisfactory may have their procurement authority revoked, adjusted or suspended and are subject to follow-up reviews within 60 calendar days and six months from restoration of procurement authority. Activities rated as marginal are subject to a follow-up review within six months. Activities receiving a marginal assessment in two consecutive reviews are automatically rated unsatisfactory.

Follow-up reports are required from the activity inspected under the following conditions:

(1) Nonconcurrency With or Inability to Implement the Recommendations. This condition and the supporting rationale should be reported within 30 days of report issuance. When disagreements or recommendations cannot be resolved between the Command and the reviewed activity, the matter shall be immediately referred to NAVSUP 02 for resolution.

(2) Repeat Findings and Special Interest Items. Responses are required within 30 calendar days of report issue date addressing an implementation plan. Updates will be provided at 30 calendar day intervals until all recommendations are complete.

(3) One-time Report on All Recommendations. A one-time status report indicating actions taken on all recommendations must be made no later than six months from the issue date of the report. [Ref. 1:p. 8]

C. CONCLUSION

This chapter provided a historical perspective of the PMR program to emphasize the significance of PMRs within DOD. Additionally, it discussed how NAVSUP as a HCA has assigned PMR responsibilities to some of its tenant commands and the procedures that they have implemented for conducting PMRs.

Chapter III explains the methodology employed to analyze a sample of 50 PMRs conducted in 1989. This analysis revealed the most common discrepancies and obtained opinions from both buyers and reviewers as to why they occur.

III. ANALYSIS OF PMR RESULTS

A. ANALYSIS METHODOLOGY

This study analyzed the PMR results of all the West Coast activities that had PMRs conducted by the Naval Regional Contracting Center (NRCC), San Diego, in 1989. For the purposes of this study, each activity was coded in order to remain anonymous. The buying statistics for each activity are contained in Appendix B.

The discrepancies for each PMR were identified by manual reference and grouped into one of six PMR review areas. The term "manual reference" refers to the document that states the procurement regulation/procedure. The six PMR review areas consist of:

- * Management Support and Control.
- * Requirements Discipline.
- * Pricing Considerations.
- * Competition.
- * Contracting Administration.
- * Procedural Aspects of Small Purchase.

A total of 253 discrepancies were noted among the 50 PMRs. The discrepancies and their frequency of occurrence are provided in Appendix C. A small percentage was considered redundant because they had different manual references that addressed the exact same requirement. Another small

percentage of these discrepancies were identified in more than one of the six review areas, but for the purposes of this study, were grouped into the area where the discrepancy was most common.

Table 1 provides the breakdown of discrepancies by review area and activity. The top column represents the number of times a discrepancy occurred during the 50 PMRs reviewed. For example, analyzing the PMR review area, Management Support and Control, several discrepancies were noted; however, the frequency of occurrence of each discrepancy indicates that it is more significant because it is a recurring problem for several of the buying organizations. Using column 2 of Table 1, for example, there were 22 discrepancies within the PMR review area Management Support and Control and these same discrepancies occurred at two different buying organizations.

For purposes of analysis in this thesis, an item that appeared six or more times was considered relevant. There was one relevant discrepancy that appeared in two areas; Supply Acquisition Regulation Supplement (SUPARS) 13.502 had eight hits under Management Support and Control and seven hits under Procedural Aspects of Small Purchase. This discrepancy will be addressed within the analysis of the Management Support and Control area.

There were also two references under the Requirements Discipline that are considered redundant. Both SUPARS 13.103(a) and the Federal Acquisition Regulation (FAR) 8.001

TABLE 1
DISCREPANCY OCCURRENCE

	PMR Re- view Area	1	2	3	4	5	6	7	8	9+	Total
I	Management Support & Control	65	22	6	8	0	2	2	2	3	110
II	Requirements Discipline	16	5	6	8	0	2	2	2	3	26
III	Pricing Considerations	5	5	1	2	0	0	0	0	0	13
IV	Competition	9	0	1	1	0	0	0	0	0	11
V	Contracting Administration	15	1	0	1	0	0	1	0	1	19
VI	Small Purchase Procedures	48	16	3	2	0	0	3	1	1	74

refer to mandatory sources of supply. These will be considered as one discrepancy.

The common discrepancy count was narrowed to 16 items, after compensating for the redundant discrepancies. The manual reference and a summary of the discrepancy is contained in Table 2. Each discrepancy and reference was thoroughly reviewed and questions for the buyers and PMR inspectors were developed for the purpose of analyzing why they seem to occur so frequently. The questions were also designed to assist the researcher in forming recommendations on how they could be prevented.

TABLE 2

MANAGEMENT SUPPORT AND CONTROL

- * SUPARS 1.603-3 Written appointment of contracting and ordering officers
- * SUPARS 1.670 Authorization of Government officials to make procurements
- * SUPARS 13.104-1(b)(3) Prior screening of purchase requests
- * SUPARS 13.104-3 Purchase descriptions designed to promote full and open competition
- * SUPARS 13.105(a) Small business-small purchase set-asides
- * SUPARS 13.105(b) Required sources of supply
- * SUPARS 13.105(c) Exceptions to small business-small purchase set-asides
- * SUPARS 13.105(d) Documentation of exceptions to small business-small purchase set-asides
- * SUPARS 13.502 Unpriced purchase order procedures

REQUIREMENTS DISCIPLINE

- * SUPARS 13.103(a) Mandatory Government sources of supply

CONTRACTING ADMINISTRATION

- * SUPARS 13.503(a) Purchase order modification procedures
- * SUPARS 13.504(b)(1) Purchase order cancellation procedures

TABLE 2 (CONTINUED)

PROCEDURAL ASPECTS OF SMALL PURCHASE

* SUPARS 13.104-5	Purchase file requirements
* SUPARS 13.507	Incorporation of required contract clauses
* DFARS 213.507(a)(1)	Incorporation of required contract clauses
* SUPARS 13.204(d)	Purchase file documentation for blanket purchase agreements (BPA)

B. INTERVIEW QUESTIONS/RESPONSES

Interviews were conducted with buyers and reviewers to determine why they felt certain discrepancies were recurring and how these problems might be prevented. This section of the thesis will provide the manual reference, followed by the questions asked during the interview process, followed by an analysis of the responses. This analysis addresses the purpose of the specific requirements and consolidates individual responses into a consensus opinion. Many of the problems were not specifically linked to one area but were rather a mix of two or more of the following:

- * Buyer knowledge.
- * Customer knowledge.
- * Time constraints.
- * Poor documentation.
- * Personnel shortage.

- * Administrative oversight.
- * Willful negligence.

Management Support and Control

MANUAL REFERENCE: SUPARS 1.603-3

Appointment of contracting officers/ordering officers of the Naval Supply Systems Command must be in writing expressly stating the limitations of authority with regard to dollar limitation and type of contract or other purchase.

MANUAL REFERENCE: SUPARS 1.670

It is the policy of the Naval Supply Systems Command (NAVSUP) that all procurements for supplies/services shall be made by Government officials having the authority to do so. Procurements by other than authorized personnel is contrary to Navy policy.

INTERVIEW QUESTIONS:

- * What do you think is the primary reason for the activity's failure to have written appointment of Contracting Officers and Ordering Officers?
- * Are the majority of the unauthorized commitments caused by the activity not meeting the administrative requirement to have written authority to contract/order or are they made by customers?
- * Are the unauthorized commitments made by customers because of long lead time, lack of satisfaction with the NFCS, or a lack of knowledge?

ANALYSIS:

The above reference requires activities to appoint contracting/ordering officers in writing. The purpose of this documentation is to formally appoint an individual as an agent for the government. This authorization should not be made unless the individual is believed to have a sound working knowledge of the procurement process and will act in the best

interest of the government. This control feature was designed to help maintain a solid core of quality purchasing agents.

All buying activities are aware of this requirement, yet it surfaces as a problem during PMRs. There are two explanations for this discrepancy: (1) buyers are qualified in all respects but, as a result of an administrative oversight, haven't received a letter, or (2) customer activities make purchases without authorization.

The number of discrepancies that occurred within the buying activity was minimal. The main reason for this discrepancy can be attributed to customer activities. These activities, sometimes unknowingly, other times purposely, commit the government financially for supplies or services without following procedures that assure the government of the best possible procurement. These buys are known as unauthorized commitments.

In most cases this problem doesn't become apparent until after the customer receives the supply or service and the contractor wants to get paid. The customer is unable to pay because the requirement never officially passed through the paying branch. The contractor assumed he had a valid contract and made delivery. The government must now ratify the unauthorized commitment.

Although the authorized buying activity doesn't have control over the customer, it still must stress that procurement of supplies or services are made only by

Government officials with proper authority, meaning a warranted contracting officer or ordering officer. Any purchase in violation of this requirement is considered to be an unauthorized commitment. Common reasons for this occurring are ignorance, miscommunication, and intent to circumvent or evade procurement regulations.

There are times when an inexperienced government employee, in response to a requirement, takes the initiative to procure an item on his own. His lack of knowledge and experience results in buys that may not be the most advantageous to the government and don't conform to the established procurement regulations.

Miscommunication was cited as another common cause of unauthorized commitments. Customers will call vendors for general or technical information and in the course of the conversation, the vendor will assume that this constitutes an order. It is very important for anyone that has contact with vendors to ensure that the vendor understands that they aren't placing an order.

Occasionally, unauthorized commitments are made by personnel with full knowledge of the rules and regulations but are intentionally done to circumvent the system. Urgency of need is probably the biggest reason for this action. Customers feel that the possible lead time involved with the system is too great or that competition may preclude them from receiving the exact item they want.

MANUAL REFERENCE: SUPARS 13.104-1(b)(3)

It is NAVSUP policy to have PRs reaching the buyer's desk already screened and ready for purchase action. Only in the most unusual circumstances should this procedure require the individual buyer to perform this screening.

INTERVIEW QUESTIONS:

- * Do the activities that were cited for having buyers screen purchase requests (PR) have a screening process established?
- * If the activity has a screening process in place, why wasn't it used?

ANALYSIS:

This reference requires screening of purchase requests (PR) before reaching the buyer's desk. There were nine activities that were cited for not showing evidence of this procedure. This screening process is designed to make sure information is complete and the required item is not in the supply system or available from a mandatory source. Reviewers usually notice this discrepancy when activities procure standard, common use items that are readily available through the system.

Purchasing activities are limited in their personnel resources and, despite established controls, the technical personnel commonly screen PRs incorrectly. This type of human error is difficult to eliminate but with good operating procedures and buyer awareness, it could be reduced.

MANUAL REFERENCE: SUPARS 13.104-3

Specifications/purchase descriptions shall, to the maximum extent practicable, be written to promote full and open competition.

INTERVIEW QUESTION:

- * Why are specifications/purchase descriptions not written to promote competition?

ANALYSIS:

The above reference stresses the importance of writing specifications and purchase descriptions as generic as possible in order to promote competition. The specifications and purchase descriptions are the responsibility of the customer. In many cases the customer knows the product that they want but do not know how to correctly describe it. They rely on vendors to provide the data required to identify the item. The vendor naturally wants the contract and provides a description that is specifically tailored to their product. In some instances vendors use their own locally-assigned part number for a standard item to give the appearance of uniqueness for their product.

When the customer provides a PR, the buying activity must determine if it is adequate enough to promote competition. Time constraints and lack of cooperation from the vendors and customer activities often prevent a thorough review of the information and a poor purchase description results in a PMR discrepancy.

MANUAL REFERENCE: SUPARS 13.105(a)

All open market purchases with an anticipated dollar value of \$25,000 or less are considered to be small business-small purchase set-asides and must be made with small business concerns.

MANUAL REFERENCE: SUPARS 13.105(b)

The requirement for small business-small purchase set-asides does not offset the responsibility of agencies to make purchases from required sources of supply, such as Federal Prison Industries, Industries for the Blind and Other Severely Handicapped, and mandatory Federal Supply Schedule Contracts.

MANUAL REFERENCE: SUPARS 13.105(c)

The small business-small purchase set-aside can be desolved and the purchase made to a large business concern if the contracting officer determines that there is no reasonable chance of obtaining quotations from two (2) or more responsible small business concerns (or at least one if the purchase does not exceed \$1000) that will be competitive in terms of market price, quality and delivery.

MANUAL REFERENCE: SUPARS 13.105(d)

Exceptions to the small business-small purchase set-aside shall be documented in the purchase file.

INTERVIEW QUESTIONS:

- * Do most buyers know the requirement to use small businesses for purchases of \$25,000 or less?
- * If they know the requirement why would they not adhere to it?
- * How extensive of a market search is necessary to determine that a small business source is not available?
- * Why would a buyer be inclined to use a large business concern over a small business?
- * How much documentation is necessary to justify exceptions to the small business set-aside requirement?
- * Do buyers fail to meet this requirement because of negligence, lack of knowledge, or time constraints?
- * Are all buyers aware of the mandatory source requirement?
- * Do buyers and customers consider sources other than the required ones more suitable to fulfilling the requirement?

ANALYSIS:

SUPARS 13.105(a) promotes small businesses by requiring all open market purchases with an anticipated dollar value of \$25,000 or less to be small business-small purchase set-asides. This is a requirement that was established as a result of PL 95-507. SUPARS 13.105(b) through (c) list exceptions to this requirement and SUPARS 13.105(d) requires proper documentation for these exceptions.

Buyers gave three primary reasons for the recurrence of this discrepancy: (1) there are no small businesses available to meet the requirement, (2) the cost of using a small business was excessive when compared to a large business price, and (3) mandatory sources are sometimes overlooked.

Many times, despite an exhaustive search, no small business can be found that will meet the requirement. This search process can be time consuming and frustrating but, as a whole, most buyers are diligent in their pursuit. The PMR discrepancy is not the fact that the buyers haven't attempted to obtain competition, it's the fact that they do not document their purchase files. The buyer's worksheet should be properly annotated as to what types of searches were done and the results. Complete documentation is important because, without it, the reviewer assumes that proper action was not taken.

Many buyers have found that in several instances small businesses are not competitive (in price) with the larger

businesses. The regulation for small business-small purchase set-asides has created a contradiction in goals. On one hand, activities are required to buy from a small business, but on the other hand they are required to purchase at the lowest price.

Since there is no formal guideline to define competition in terms of market price when comparing large and small business proposals, the buyer must make an objective decision in the best interest of the government. As defense dollars are becoming more and more scarce, the lower-priced product is usually chosen. If the purchasing agent determines that small business did not quote a fair and reasonable price, the contracting officer's approval must be obtained prior to soliciting a large business. This is often controversial and would require complete documentation in the purchase file. Once again, the PMR discrepancy is not questioning contracting officer's decisions, it is assuming that the action is incorrect if not fully documented since a procedure was not followed.

The emphasis on small business-small purchase set-asides often overlooks mandatory sources of supply. Buyers are aware of the mandatory sources, but often need to be reminded of the requirement and should occasionally review the products that must be procured from those sources. Those buyers that have had experience with the mandatory sources commonly say that

prices are sometimes higher than if the item were procured through open competition.

MANUAL REFERENCE: SUPARS 13.502

An order for supplies or services/Request for Quotation (DD Form 1155) and the reverse of Order for Supplies or Services/Request for Quotation (DD Form 1155r) shall be used to issue unpriced purchase orders and shall contain the FAR clause 52.213-3 "Notice to Supplier (Apr 1984)." Block 13 of the DD Form 1155 shall be annotated to require the contractor to send the invoice to the Contracting Officer. A realistic not-to-exceed (NTE) monetary limitation will be established either for each line item or for the total order. The purchase file shall be documented with the basis for establishment of the NTE price. The words "Not to Exceed" will be annotated over the amounts shown in Blocks 17 and 25 of the DD Form 1155.

INTERVIEW QUESTIONS:

- * How should the buyers show that a proper analysis of the NTE price was made?
- * Is the lack of documentation because of neglect, lack of knowledge or insufficient time?

ANALYSIS:

The above reference provides specific guidance regarding the issuance of unpriced orders. SUPARS 13.502-1(c) states that the basis for a fair and reasonable monetary limitation shall be reviewed and documented if unpriced orders are used. This regulation also requires inclusion of the "Notice to Supplier" clause (FAR 52.213-3) for all unpriced purchase orders. This clause states:

This is a firm order ONLY if your price does not exceed the maximum line item or total price in the schedule. Submit invoices to the Contracting Officer. If you cannot perform in exact accordance with this order, WITHHOLD PERFORMANCE and notify the Contracting Officer immediately, giving your quotation.

The discrepancy most activities were cited for was not making a careful determination for the not-to-exceed value. In many cases, the activity was basing the monetary limitation on the amount provided on the purchase requisition. In addition the contracting officers were not validating billed prices nor did they use any of the various methods for establishing price reasonableness.

Requirements Discipline

MANUAL REFERENCE: SUPARS 13.103(a)

Open market purchases can be made only when requirements cannot be obtained from mandatory Government sources of supply which are listed below in descending order of priority:

- 1) Defense/Federal Supply Systems for material assigned a National Stock Number (NSN)
- 2) Excess personal property from other agencies
- 3) Federal Prison Industries
- 4) National Industries for the Blind or Other Severely Handicapped.
- 5) Mandatory GSA Federal Supply Contracts
- 6) Optional GSA Federal Supply Schedule Contracts.

INTERVIEW QUESTION:

- * Why do buyers choose open market purchases over the mandatory Government sources?

ANALYSIS:

The above reference states that open market purchases can be made only when requirements cannot be obtained from mandatory Government sources of supply. This discrepancy is usually uncovered by reviewers when standard items are procured. Items like trash cans, chairs and filing cabinets were common examples. Sometimes these standard items were not

acceptable, but a statement of non-acceptability, certified by the commanding officer along with the purchase request was not accomplished before an open market purchase action was initiated. Administrative oversight by the buyer is the most common reason for this discrepancy.

Contracting Administration

MANUAL REFERENCE: SUPARS 13.503(a)

All modifications to purchase orders must be made using a SF 30 signed by the contracting officer. A purchase order shall not be modified by issuance of a superseding DD Form 1155. There are four (4) different types of modification. The type of modification will depend on what kind of change is to be made.

MANUAL REFERENCE: SUPARS 13.504(b)(1)

If a purchase order that has not been accepted in writing by the contractor is to be withdrawn or cancelled, the contracting officer shall notify the contractor by telephone or in writing that the purchase order has been cancelled at no cost to either party. If the contractor is notified by telephone and agrees to the withdrawal/cancellation at no cost, the order will be withdrawn by issuing a SF30 as a unilateral modification in accordance with SUPARS 13.305(b)(2). The modification should state that the purchase order is hereby withdrawn at no cost to either party and shall include a reference to the conversation in which the contractor agreed to the withdrawal. The SF30 should be sent to the contractor by certified mail, return receipt required. If the contractor is notified of the cancellation in writing, the order will be cancelled by issuing a SF30 as a supplemental agreement in accordance with SUPARS 13.503(b)(3). The modification shall state that the purchase order is hereby cancelled at no cost to either party and the contractor will be requested to indicate acceptance of the cancellation by signature on the SF30.

INTERVIEW QUESTIONS:

- * To what do you attribute improper modification procedures?
- * To what do you attribute the incorrect cancellation procedures?

ANALYSIS:

A modification is any action necessary to change the terms and conditions of the existing purchase/delivery order. This includes changes to price, delivery date, nomenclature, accounting information and cancellations. SUPARS 13.503 specifies that all modifications made to purchase orders must be made by preparing an SF 30, Amendment of Solicitation/Modification of Contract. There are four types of modification. Each type is described below:

- * Change Orders. Change orders can only be issued when the original purchase order was bilateral and the reason for the modification is an emergency situation where time does not permit the negotiation of a price.
- * Administrative Changes. Administrative change is a modification which does not alter the basic agreement between the Government and the contractor. Examples include changes in accounting data, job order number, or correction of typographical errors. These do not require the contractor's signature.
- * Supplemental Agreement. Supplemental Agreement is any modification that has been agreed to by both parties. Examples include change in delivery date, cancellation of an order, change in quantity of supplies and or change in the scope of work to be performed. These must be signed by both parties. Supplemental agreements which change the obligations of either party should reflect consideration given.
- * Unilateral Modifications. Unilateral modifications allow the buyer to make changes to a unilateral purchase order without obtaining the contractor's written acceptance. Unilateral modification may include withdrawal of all or part of the order. Conditions for use are:
 - a. Contractor has not begun performance
 - b. The change is within the scope of the original order.

- c. The modification reflects the contractor's written or oral confirmation of the proposed revision. [Ref. 4: p. 135-5]

Over 20% of the activities were cited for improper modification procedures. Since this is such a broad area, there were many types of mistakes made by buyers. Most were caused by a lack of procedural knowledge on the part of the buyers. The other notable reason for these violations is administrative in nature. Several activities were cited because the modifications did not have the contractor's signature. Unlike large purchases, where the contractor signs the modification first and forwards it to the buying activity, small purchases require the government to sign first and forward to the contractor. There were frequent examples of documents not being returned from the contractor and no evidence of administrative follow-up.

Procedural Aspects of Small Purchase

MANUAL REFERENCE: SUPARS 13.104-5

A purchase file containing adequate documentation of all actions taken will be maintained for each individual purchase action made regardless of which small purchase method is used. The file contents of individual purchase action should be maintained in the same folder, if practicable. Each purchase action file shall include as a minimum the following:

- (1) Copy of the purchase request/requisition document with evidence of available funds, adequate purchase description, and sole source justification from the customer, if applicable.

- (2) Copy of the abstract/worksheet which includes complete record of the solicitation including contractors contacted, responses received, evaluations, etc.

(3) Evidence of award and basis on which the award was made including documentation of the price reasonableness determination, if applicable.

(4) Any miscellaneous documentation supporting any action taken.

(5) Documentation of any administrative actions taken, including signed copies of all modifications.

(6) Copy of the invoice and evidence of receipt inspection and acceptance when practicable.

INTERVIEW QUESTIONS:

- * What are the most common problems with purchase files?
- * Are there any procedures or controls to ensure that purchase files are being documented?

ANALYSIS:

The purchase file was developed to be a complete package of information and documentation for each specific purchase. It is the most important source to determine whether proper procedures were followed and whether the award was made in full compliance with regulatory mandates. The required contents for this file are listed above.

The main discrepancy with the purchase file was lack of documentation on the buyer's worksheet. This was identified (in other areas of this report) as a key reason why discrepancies were cited. Without proper documentation the reviewer has no way of knowing that proper procedures were followed.

This discrepancy was cited for both automated and manual activities. Proper, careful, complete and accurate documentation is essential to ensure that each purchase file can clearly reflect actions and determinations made in the

award process. This can only be done if the buyers know the proper procedures.

MANUAL REFERENCE: SUPARS 13.507

The General Provisions on the reverse of the DD Form 1155 (DD Form 1155r) apply to all unilateral purchase orders, except that provision numbers 12 and 14 apply only if the appropriate box is checked in Block 16 of the DD Form 1155. The General Provisions include basic contractual terms and conditions applicable to both the contractor and the Government and include items such as Inspection and Acceptance, Variation in Quantity, Payments, Discounts, etc.

MANUAL REFERENCE: DFAR 213.507(a)(1)

The following clauses are normally appropriate for unilateral purchase orders. These clauses shall be included in each order as applicable.

- (i) FAR 52.252-2 "Clauses Incorporated by Reference"
- (ii) FAR 52.203-1 "Officials Not to Benefit"
- (iii) FAR 52.203-3 "Gratuities"
- (iv) FAR 52.203-5 "Covenant Against Contingent Fees"
- (v) FAR 52.203-7 "Anti-Kickback Procedures"
- (vi) FAR 52.212-9 "Variation in Quantity"

INTERVIEW QUESTIONS:

- * Why do you think that the appropriate contract clauses are not included on purchase orders?
- * Has the lack of appropriate clauses presented any serious problems?

ANALYSIS:

The above references describe contract clauses authorized for incorporation in purchase orders. Inclusion of these clauses is a legal and professional function which must be performed to adequately protect both the government and the vendor throughout the life of the contract.

Activities continually add inappropriate clauses or forget to add pertinent clauses. The "Most Favored Customer" clause

is an example of a clause that many activities include but it has been cancelled since 1987. Some activities use a boilerplate clause sheet to assist the buyers; however, it is important to ensure that this sheet is kept current. Again, proper training could help prevent these problems.

MANUAL REFERENCE: SUPARS 13.204(d)

Each BPA call shall be documented on the purchase request (requisition) or on a work abstract sheet. The documentation must include the following:

- (1) BPA number;
- (2) Call number;
- (3) Date of call;
- (4) Date of required delivery;
- (5) Accounting and appropriation data;
- (6) Quantity;
- (7) Unit, extended, and total price of call;
- (8) Signature of person placing call (this requirement is waived for NAVSUP 02 approved automated systems (e.g., APADE) however the name of the person placing the call shall be identified on the DD Form 1155.

INTERVIEW QUESTIONS:

- * What BPA call items are most commonly left undocumented?
- * Why are these items forgotten?

ANALYSIS:

Any procurement that uses a blanket purchase agreement requires proper documentation in accordance with SUPARS 13.204(d). This documentation should be annotated on the purchase request or the work abstract sheet. Several activities were cited for not adhering to this administrative requirement. The main reason for this discrepancy is administrative oversight. Both the buyers and the reviewers feel that this requirement is well known; however, in the

process of completing the procurement many buyers overlook the necessary details that make a procurement file complete.

C. CONCLUSION

This chapter evaluated the 16 most common discrepancies found during this research. It provides the requirement from the manual reference, interview questions, and a discussion of various buyers' and reviewers' opinions on why these discrepancies occur.

The following chapter provides the conclusions and recommendations of the researcher. It consolidates information gathered in previous chapters, formulates answers to the primary and subsidiary research questions and develops recommendations that can reduce the occurrence of many PMR discrepancies.

IV. ANSWERS TO RESEARCH QUESTIONS AND CONCLUSIONS

A. ANSWERS TO RESEARCH QUESTIONS

1. Primary Research Question

- * What are the most common discrepancies found during Procurement Management Reviews (PMR) at Navy small purchase buying activities?

This thesis reviewed 50 PMRs conducted by the Naval Regional Contracting Center (NRCC), San Diego, in 1989. A total of 253 discrepancies were noted. Discrepancies occurring six or more times was considered significant enough to warrant further analysis in this thesis. This narrowed the common discrepancy count down to 16 items. These discrepancies were written up in the six general areas reviewed during the PMR process. These were discussed in Chapter III and summarized in Table 2.

2. Subsidiary Research Questions

- * What is the purpose of a PMR?

Department of Defense Directive 5126.34, Defense Procurement Management Review Program, directs each Service to develop and conduct a program of periodic reviews of their contracting and contract management organizations. This program was developed to ensure that activities comply with Federal, DoD and Navy regulations and procedures. It is also the means by which Commander, Naval Supply Systems Command (COMNAVSUP) monitors and controls procurement authority

granted to various buying activities throughout the United States.

* How are PMR discrepancies corrected?

Upon completion of a PMR, the activity is provided a written report of the findings. This report also provides an overall assessment of an activity's performance by rating them either satisfactory, marginal, or unsatisfactory. Activities that receive a rating of marginal or unsatisfactory may have their procurement authority revoked, adjusted or suspended and are subject to follow-up reviews within 60 calendar days or, in the case where procurement authority has been revoked, a six month follow-up review is conducted. Activities that agree with the findings must make the necessary changes and respond in writing indicating what action has been taken. If an activity disagrees with a finding or is unable to implement the recommendations, a report of nonconcurrence is forwarded to Commander Naval Supply Systems Command for a determination and final resolution.

* Why do the discrepancies occur (in the opinion of buyers and PMR inspectors)?

Interviews were conducted with buyers and reviewers to determine why they felt certain discrepancies recurred and how they might be prevented. The reasons for the discrepancies are not always cut and dried. Also, many had two or more reasons for discrepancy recurrence. Table 3 provides a

TABLE 3
REASONS FOR DISCREPANCIES

COMMON REASON FOR DISCREPANCY

Lack of Buyer Knowledge							
Poor Documentation							
Administrative Oversight							
Lack of Customer Knowledge							
Time Constraints							
Personnel Shortage							
Willful Negligence							
<u>MANUAL REFERENCE</u>							
SUPARS 1.603-3					X		
SUPARS 1.670	X		X	X	X		
SUPARS 13.104-1(b) (3)		X	X		X		
SUPARS 13.104-3			X	X			X
SUPARS 13.105(a)						X	X
SUPARS 13.105(b)						X	X
SUPARS 13.105(c)						X	X
SUPARS 13.105(d)						X	X
SUPARS 13.502						X	X
SUPARS 13.103(a)						X	X
SUPARS 13.503(a)					X	X	X
SUPARS 13.504(b) (1)					X	X	X
SUPARS 13.104-5			X		X	X	X
SUPARS 13.507					X		X
DFARS 213.507(a) (1)					X		X
DFARS 13.204(d)					X		X

summary of the reasons for each of the 16 common discrepancies reoccurring.

As indicated in Table 3, there are seven common reasons why these PMR discrepancies occur according to buyers and reviewers interviewed. The following paragraphs will discuss each of these reasons.

a. Buyer Knowledge

Buyer knowledge was cited as the main reason for 13 of the 16 most common PMR discrepancies. This does not mean to imply that buyers are incompetent. On the contrary, the buyers do very well considering the challenges and the enormous responsibility they work under. They are torn in several directions and have demands placed on them that often contradict each other. For example, they are required to adhere to social-economic goals, comply with complex and continually changing regulations, satisfy demanding customers with short-fused requirements, and perform at grade levels that are not commensurate with their responsibility. These are not excuses for the discrepancies, but rather they demonstrate how the above factors, combined with a lack of knowledge, make it difficult to maintain total compliance and a perfect purchasing shop.

b. Poor Documentation

Poor documentation was cited as the second most common reason for discrepancies (nine of 16 discrepancies). Documentation refers to the annotations and remarks in the purchase file which substantiate a specific action. Often activities were cited for not following proper procedures when

in fact all procedures were accomplished, but the actions were not documented. Complete documentation is important because, without it, the reviewer can only assume that a buyer failed to comply with a regulation.

c. Administrative Oversight

Administrative oversight includes all administrative requirements other than those required to document or justify a procurement action. This goes hand-in-hand with poor documentation in that without written evidence, the reviewer has no basis for which to consider that proper action was taken.

d. Customer Knowledge

Customer knowledge was cited as a reason for two of the discrepancies. Many of the commands served by the buying activities do not know or understand the complex rules and regulations that govern procuring activities. For example, they don't appreciate the importance of providing a complete purchase description or realize the reasons for long lead times and unauthorized commitments are the result.

e. Time Constraints

Time constraints was another reason for certain PMR discrepancies. Supporting operational forces with dynamic requirements often requires quick resourceful action. Most of the procurement procedures add to procurement administrative lead time (PALT) which can ultimately delay delivery of the

product. Because of the criticality of the item, procurement procedures are sometimes circumvented or neglected.

f. Personnel Shortages

Personnel shortages place a heavy demand on the existing staff. Since the increased emphasis on PALT, buyers have become more concerned with completing the procurement action and procedures not always followed. With a limited staff and tight time constraints, personnel don't pay attention to minor details which are necessary for a complete and correct procurement. Additionally, although some activities appear fully staffed numerically, they are actually understaffed because of the high turnover and long lead time required to train new buyers.

g. Willful Negligence

Willful negligence or premeditated intent to circumvent the system was cited as a reason for unauthorized purchases. Customers and buying activities can be at fault for this discrepancy. In the case where it is the customer's unauthorized commitment, the buying activity is cited for a discrepancy if, in the determination of the reviewer, a trend seems to exist. The buying activity is cited because they granted procurement authority to those customers and are responsible for ensuring that they know the procedures within their buying authority.

The other reason buying activities are cited for a PMR discrepancy may be due to the fact that they ratify

unauthorized commitments beyond their ratification authority. For example, a buying activity may have procurement authority of \$25,000, but only have ratification authority of \$1000.

* What can be done to prevent recurring discrepancies?

Although there is no panacea in sight, there are some possible actions that can reduce the number of recurring discrepancies. These include: (1) increased training for buyers and customers, (2) more use of boilerplate check sheets and desk top guides, and (3) provide incentives for professional growth of buyers.

Lack of buyer knowledge contributed to 13 of the 16 common discrepancies. Education and practical experience are two good ways to improve knowledge. Activities can take different approaches on how to educate their buyers. Formal training, through the use of schools or regularly-scheduled sessions, is one of the most common methods, but informal methods can be equally effective.

Informal training occurs through interaction between buyers, customers, vendors, and reviewers. By stimulating this relationship, individuals can become better informed and more effective. An example of this process would be having buyers from various activities assist the PMR team in their review. This allows buyers the opportunity to see how other activities operate and look for ideas to improve their own activity.

Boilerplate check sheets and desktop reference guides can help ensure that buyers adhere to regulations and requirements. Many activities are already using these aids and report favorable results. The only reported problem is that activities forget to update rule and regulation changes on their guide sheets. Since the PMR team must remain current on all new procedures and regulations they could periodically provide a summary of current rule and regulation changes to their field activities. This ensures that activities haven't overlooked major changes and also would be a valuable training device. This update summary should also clarify ambiguities and contradictions in regulations so that buyers are more consistent in their decisions.

The Naval Postgraduate School has developed a small purchase handbook that is extremely useful for reference and training. Acquisition and Contracting students at the Naval Postgraduate School could maintain this manual on a continuing basis and make it available to Navy buying activities.

During the PMR, inspectors are exposed to various effective techniques and procedures. These methods should be passed to other activities as suggestions on how to improve their operations. The PMR recommendations usually tell an activity to comply with a regulation but don't offer suggestions on how that should be done. The PMR team can save activities valuable time by providing insight on how other

activities handle similar problems. Perhaps a lessons learned guide could be provided for both correcting actions and training purposes.

Most activities have reported staff shortages and high turnover of their buyers (GS-1105 series). This makes it difficult to maintain a solid core of quality purchasing agents, because once personnel are trained they move to other areas where they can progress and receive satisfactory compensation for their efforts. High turnover can be expensive and also increases the requirement for training. The career progression for a GS-1105 needs to be improved and other incentives added to stimulate professional growth. Initiatives to make the GS-1102 series (contract negotiators) a professional core are in process, and a similar, but perhaps less stringent, set of requirements should extend to the GS-1105 series.

B. CONCLUSIONS

This research analyzed 50 PMRs that were conducted by the Naval Regional Contracting Center (NRCC), San Diego, in 1989. It revealed that during this time there were 16 recurring discrepancies that were common among various activities. After conducting interviews with buyers, procurement managers, and PMR inspectors, the researcher concluded that these discrepancies were attributed to one or more of the following reasons:

- * Lack of buyer knowledge.
- * Poor documentation.
- * Administrative oversight.
- * Time constraints.
- * Lack of customer knowledge.
- * Personnel shortages.
- * Willful negligence.

Although no procurement activity is expected to be flawless, there are some actions that activities can take to reduce the number of PMR discrepancies. This research proposed three recommendations that can help activities improve. These include:

- * Increased training for buyers and customers.
- * More use of boilerplate check sheets and desktop guides.
- * Provide incentives for professional growth.

Some of these recommendations will be more difficult to implement than others, but any effort in these directions should help reduce the number of recurring PMR discrepancies.

APPENDIX A

PROCUREMENT MANAGEMENT REVIEW CHECKSHEET

PART A

COMMAND:

DATE

YES NO

1. IS CONTRACTING AUTHORITY GRANTED PER SUPARS 1.601-90(e)(1)(i)(93)?
2. ARE ONE TIME REQUESTS FOR INCREASED CONTRACTING AUTHORITY HANDLED PER SUPARS 1.601-90(e)(1)(i)(94)?
3. ARE ADDITIONAL CONTRACTING OFFICERS APPOINTED IN WRITING WITH A "CONTRACTING OFFICER APPOINTMENT DOCUMENTATION SHEET"? (SUPARS 1.603-3(91); FAR 1.603)
4. ARE ORDERING OFFICERS APPOINTED IN WRITING USING A SF 1402 OR SUCH OTHER APPROPRIATE FORM? (SUPARS 1.603-3(93))
5. IS EACH CONTRACTING ACTION MAINTAINED IN A SEPARATE FILE WITH ALL BACKUP DOCUMENTATION INCLUDED, CONSTITUTING A COMPLETE HISTORY OF THE TRANSACTION? (SUPARS 13.104-5(a))
6. ARE ALL CONTRACTING ACTIONS ACCOMPLISHED ONLY UPON RECEIPT OF AN APPROVED PURCHASE REQUEST? (SUPARS 13.104-1)
7. ARE PURCHASE REQUESTS CONTROLLED TO:
(SUPARS 13.104-1(b)(4))
 - a. MONITOR THE PROGRESS OF REQUESTS?
 - b. PROVIDE STATUS INFORMATION?
 - c. ASSIGN PRIORITY ACTION TO URGENT REQUESTS?

YES NO

8. ARE PURCHASE REQUESTS DATED UPON RECEIPT?
(SUPARS 13.104-1(b)(1))
9. DO PURCHASE REQUESTS CONTAIN: (SUPARS 13.104-1(b)(1) AND (2))
 - a. AUTHORIZED SIGNATURES?
 - b. ACCOUNTING INFORMATION, INCLUDING TRANSPORTATION ACCOUNTING DATA
 - c. PRIORITY DESIGNATOR AND REQUIRED DELIVERY DATE SHOWN AS A SPECIFIC CALENDAR DATE?
 - d. REQUIRED CLEARANCES AND APPROVALS?
 - e. PLAIN ENGLISH ADEQUATE PURCHASE DESCRIPTION OR SPECIFICATION/STATEMENT OF WORK?
 - f. ADEQUATE JUSTIFICATION AND END USE STATEMENT?
 - g. CERTIFICATE THAT NO STANDARD STOCK MATERIAL IS SUITABLE?
 - h. FULL SOLE SOURCE JUSTIFICATION?
10. WHEN PURCHASES ARE MADE OF FOREIGN ORIGIN ITEMS OTHER THAN FROM A MANDATORY GSA FSS CONTRACT, IS THE BUY AMERICAN ACT APPLIED?
(FAR 25.100; SUPARS 13.107-2)
11. ARE ONLY AUTHORIZED PURCHASES MADE FROM NAVY EXCHANGES? (SUPARS 8.920)
12. ARE CONTROLS ESTABLISHED TO ENSURE THAT THE FUNCTIONS OF INITIATION OF REQUIREMENTS, AWARD OF PURCHASE ACTION AND RECEIPT OF MATERIAL ARE NOT PERFORMED BY THE SAME PERSON? (SUPARS 13.103(c)(2)(v))
13. ARE ALL SUPPLIES AND SERVICES WHICH PROPERLY WOULD BE GROUPED TOGETHER CONSOLIDATED INTO THE SAME TRANSACTION? (SUPARS 13.103(c)(2)(ii))
14. ARE SUPPLIES PROCURED IN THE FOLLOWING DESCENDING ORDER OF PRIORITY?
(SUPARS 13.103(a))

YES NO

- a. DEFENSE/FEDERAL SUPPLY SYSTEMS FOR MATERIAL ASSIGNED A NATIONAL STOCK NUMBER?
 - b. EXCESS PERSONAL PROPERTY FROM OTHER AGENCIES?
 - c. FEDERAL PRISON INDUSTRIES?
 - d. NATIONAL INDUSTRIES FOR THE BLIND AND OTHER SEVERELY HANDICAPPED?
 - e. MANDATORY GSA FSS CONTRACTS?
 - f. OPTIONAL GSA FSS CONTRACTS/OTHER COMMERCIAL SOURCES?
15. WHEN SUPPLIES ARE REQUIRED TO BE OBTAINED FROM THE FEDERAL PRISON INDUSTRIES, ARE THE NECESSARY CLEARANCES OBTAINED BEFORE OTHER SOURCES ARE USED, EXCEPT WHEN THE CONDITIONS OF FAR 8.606 APPLY? (FAR 8.605)
16. ARE ACQUISITIONS OF SUPPLIES HAVING AN ANTICIPATED DOLLAR VALUE OF \$25,000.00 OR LESS AND SUBJECT TO SMALL PURCHASE PROCEDURES RESERVED EXCLUSIVELY FOR SMALL BUSINESS CONCERNS, UNLESS SET-ASIDE IS DISSOLVED? (FAR 13.105; SUPARS 13.105)
17. IF OTHER THAN SMALL BUSINESSES ARE USED, DOES THE PURCHASE FILE CONTAIN ADEQUATE JUSTIFICATION? (SUPARS 13.105)
18. WHEN EVALUATING QUOTATIONS FOR SMALL PURCHASES OVER \$2,500.00, ARE DISCOUNT TERMS EXCLUDED FROM THE CONSIDERATION AND TRANSPORTATION CHARGES INCLUDED? (SUPARS 13.107)
19. ARE FIRST DESTINATION TRANSPORTATION COSTS CHARGED TO SERVICE-WIDE TRANSPORTATION ACCOUNTS RATHER THAN ACTIVITY OPERATING FUNDS? (SUPARS 13.104-6(c)(1))
20. ARE EFFECTIVE FOLLOW-UP PROCEDURES IN FORCE TO ENSURE VENDOR INVOICES ARE RECEIVED IN A TIMELY MANNER?

YES NO

21. ARE SMALL PURCHASES, NOT OVER \$2,500.00, EQUITABLY DISTRIBUTED AMONG QUALIFIED SUPPLIERS? (SUPARS 13.106)
22. WHEN ORDERING SUPPLIES AGAINST A FSS CONTRACT AND SOME OF THE SUPPLIES REQUIRED ARE NOT INCLUDED IN THE SCHEDULE, IS A PURCHASE ORDER USED AND ALL THE SUPPLIES IDENTIFIED AS SCHEDULE OR NON-SCHEDULE (SUPARS 8.405-2(b))
23. ON COMBINED FSS/NON FSS PURCHASE ORDERS, ARE THE REQUIREMENTS FOR COMPETITION IN THE OPEN MARKET SATISFIED? (SUPARS 8.405-2(b))
24. IF TIMES AVAILABLE FROM A MANDATORY FSS CONTRACT WILL NOT MEET THE ACTIVITY'S SPECIFIC NEEDS BUT SIMILAR ITEMS FROM ANOTHER SOURCE WILL, HAS THE ACTIVITY REQUESTED AND RECEIVED A WAIVER PRIOR TO INITIATING PURCHASE ACTION? (FAR 8.404-3; SUPARS 8.404-3)
25. ARE COPIES OF DELIVERY/PURCHASE ORDERS INTENDED TO HAVE THE SAME FORCE AND EFFECT AS THE SIGNED ORIGINAL MARKED "DUPLICATE ORIGINAL"? (FAR 4.101)
26. WHEN PREPARING UNILATERAL MODIFICATIONS TO PURCHASE ORDERS (EXCEPT FOR ADMINISTRATIVE CHANGES) ARE THE ADDITIONAL GENERAL PROVISIONS INCORPORATED BY REFERENCE AND CONTRACTOR ACCEPTANCE OBTAINED? (SUPARS 13.503(d) AND (e))
27. ARE UNPRICED PURCHASE ORDERS ISSUED ONLY WHEN THE CONDITIONS OF SUPARS 13.502 ARE MET AND IS THE NOTICE TO SUPPLIER CLAUSE INCLUDED?
28. ARE PERSONS AUTHORIZED TO PLACE BPA CALLS IDENTIFIED BY ORGANIZATIONAL COMPONENT AND DOLLAR LIMITATION PER CALL FOR EACH INDIVIDUAL? (FAR 13.203-1; SUPARS 13.201)
29. WHEN PLACING A BPA CALL, IS ONE COPY OF THE PROCUREMENT REQUEST FROM MARKED "RECEIPT CONTROL COPY" AND ANOTHER COPY MARKED "FISCAL CONTROL COPY"? (SUPARS 13.204(d))
30. ARE BPA FILES REVIEWED AT LEAST SEMIANNUALLY BY THE USING CONTRACTING OFFICER OR DESIGNATED REPRESENTATIVE TO ENSURE:

YES NO

- a. CALLS ARE DISTRIBUTED PROPERLY?
 - b. MANDATORY SUPPLY CHANNELS ARE NOT CIRCUMVENTED?
 - c. CALLS PLACED ARE IN THE BEST INTERESTS OF THE GOVERNMENT?
 - d. ADEQUATE COMPETITION HAS BEEN OBTAINED FOR CALLS OVER \$2,500.00?
 - e. CALLS ARE BEING PLACED ONLY BY AUTHORIZED PERSONNEL AND WITHIN THEIR ESTABLISHED MONETARY LIMITATIONS?
 - f. REQUIREMENTS ARE NOT BEING SPLIT?
 - g. PROPER ATTENTION IS BEING GIVEN TO PRICING?
 - h. CALLS ARE ADEQUATELY DOCUMENTED?
31. IS THE NAVSUP FORM 1328 (BPA CALL REVIEW REPORT) USED TO DOCUMENT BPA REVIEWS AND IS THE REPORT FILED IN THE BPA FILE? (SUPARS 13.205(a)(3))
32. ARE AT LEAST 25% OR 150 BPA FILES, WHICHEVER IS GREATER, REVIEWED DURING SEMIANNUAL BPA REVIEWS AND ALL BPA FILES REVIEWED AT LEAST ONCE IN A TWO YEAR PERIOD? (SUPARS 13.205(a)(2))
33. DOES THE BPA ISSUING CONTRACTING OFFICER OR DESIGNATED REPRESENTATIVE ANNUALLY REVIEW EACH BPA AND TAKE WHATEVER ACTION IS INDICATED TO UPDATE THE AGREEMENTS? (SUPARS 13.205-1)
34. IS THE SF 44 USED TO EFFECT OVER THE COUNTER PURCHASE ONLY WHEN NO OTHER PURCHASE METHOD IS MORE SUITABLE AND WHEN ALL OF THE CONDITIONS OF SUPARS 13.503-3(b) ARE MET?
35. ARE SF 44s EXECUTED ONLY UPON DELIVERY OR PERFORMANCE BY THE SELLER? (SUPARS 13.503-3(c))
36. ARE PROPER CONTROLS IN PLACE TO ENSURE SECURITY OF BLANK SF 44s? (SUPARS 13.503-(e))

YES NO

37. ARE ORDERING EMPLOYEES AUTHORIZED TO USE SF 44s DESIGNATED IN WRITING BY THE COMMANDING OFFICER OR SUPPLY OFFICER? (SUPARS 13.503-3(e))
38. IS THE ACTIVITY IN COMPLIANCE WITH THE STANDARDS OF CONDUCT AND CODE OF ETHICS FOR GOVERNMENT EMPLOYEES? (SECNAVINST 5370.2H; FAR PART 3)
39. ARE DEFICIENCIES OR DISCREPANCIES IN SHIPMENT HANDLED AS PROVIDED IN FAR 8.408?
40. IS THE MONTHLY PROCUREMENT SUMMARY (DD FORM 1057) PREPARED CORRECTLY AND SUBMITTED IN A TIMELY MANNER? (SUPARS 4.672-90; DFARS 4.672)
41. HAVE ALL PERSONNEL INVOLVED IN THE PURCHASING FUNCTION ATTENDED A NAVSUP AUTHORIZED SMALL PURCHASE COURSE? (SUPARS 13.103-1)

PART B

COMMAND

DATE:

YES NO

1. IS THE PURCHASE DESCRIPTION ADEQUATE
2. DID THE REQUIREMENT RECEIVE TECHNICAL SCREENING?
3. ARE REQUIRED APPROVALS ON FILE?
4. IS THERE EVIDENCE OF CHALLENGES TO QUESTIONABLE ITEMS?
5. WAS A GOVERNMENT SOURCE USED WHEN REQUIRED?
6. WAS THE APPROPRIATE PURCHASE METHOD USED?
7. WERE SOLICITATION PROCEDURES ADEQUATE?
8. WERE COMPETITIVE CONSIDERATIONS ADEQUATE?
9. IS QUALITY OF PRICING ADEQUATE?
10. ARE FAIR AND REASONABLE PRICE DETERMINATIONS SUFFICIENT?

YES NO

11. ARE SOLE SOURCE JUSTIFICATIONS ADEQUATE?
12. IS THE BUYER'S EVALUATION PROCESS ADEQUATE?
13. WAS THE CONTRACT APPROPRIATELY AWARDED?
14. ARE TRANSPORTATION TERMS PROPER?
15. WERE DISCOUNTS HANDLED PROPERLY?
16. WERE SMALL BUSINESSES CONSIDERED?
17. WERE FAST PAY PROCEDURES USED/NOT USED, AS APPROPRIATE?
18. HAS AN AUTHORIZED CONTRACTING OFFICER SIGNED THE PURCHASE ORDER?
19. WAS AN ORAL/CONFIRMING ORDER APPROVED BY A CONTRACTING OFFICER?
20. IS THE CONTRACTUAL FORMAT EXECUTED CORRECTLY?
21. ARE APPROPRIATE CONTRACTING CLAUSES APPLIED?
22. IS THE OVERALL QUALITY OF FILE DOCUMENTATION ADEQUATE?

DOCUMENT IDENTIFICATION:

PART C

COMMAND

DATE:

YES NO

1. PRICING (25%)
 - a. ARE PRICES PAID REASONABLE? (15%)
 - b. IS PRICING DOCUMENTATION ADEQUATE? (5%)
 - c. IS OUTSIDE PRICING ASSISTANCE AVAILABLE AND USED? (5%)
2. MANAGEMENT SUPPORT AND CONTROL (30%)

YES NO

- a. HAVE PREVIOUS CMR FINDINGS BEEN CORRECTED?
(8%)
 - b. IS STAFFING, TRAINING, AUTOMATION AND
MANAGEMENT INFORMATION ADEQUATE? (4%)
 - c. IS CUSTOMER RESPONSIVENESS SATISFACTORY?
(5%)
 - d. ARE PURCHASE DESCRIPTIONS ADEQUATE? (5%)
 - e. IS THERE SEPARATION OF FUNCTIONS AND OTHER
SAFEGUARDS TO PROTECT AGAINST FRAUD? (4%)
 - f. IS CONTRACTING AUTHORITY APPLIED PROPERLY
TO PREVENT CIRCUMVENTION OF RULES AND
REGULATIONS? (4%)
3. COMPETITION (15%)
- a. DOES THE RATE OF COMPETITION MEET OR
EXCEED GOAL? (5%)
 - b. ARE SOLE SOURCE JUSTIFICATIONS ADEQUATE?
(5%)
 - c. IS THERE COMMAND SUPPORT FOR COMPETITION
AND IS THE COMPETITION ADVOCACY PROGRAM
ADEQUATE? (5%)
4. REQUIREMENTS DISCIPLINE (15%)
- a. IS THERE ADEQUATE JUSTIFICATION FOR THE
PURCHASE OF CENTRALLY MANAGED/STOCKED
ITEMS? (10%)
 - b. ARE REQUIRED GOVERNMENT SOURCES OF SUPPLY
USED? (5%)
5. CONTRACTING ADMINISTRATION (10%)
- a. IS THE CONTRACT ADMINISTRATION PROCESS
ADEQUATE? (5%)
 - b. IS MONITORING OF CONTRACTOR PERFORMANCE
ADEQUATE? (5%)
6. SPECIAL INTEREST ITEMS (5%)

YES NO

- a. IS THERE EVIDENCE OF COMMAND COMMITMENT TO COUNTERACTING WASTE, FRAUD AND ABUSE? (1%)
- b. IS THE CONTRACTING FUNCTION INCLUDED IN THE COMMAND INTERNAL REVIEW PROGRAM? (1%)
- c. ARE COST REDUCTION EFFORTS EVIDENT, ESPECIALLY IN SPARE PARTS ACQUISITION, AND ARE COST SAVINGS IDENTIFIED? (1%)
- d. ARE THERE CONTROLS OVER CONTRACTOR SUPPORT SERVICES? (1%)
- e. DOES THE COMMAND OBSERVE THE STANDARDS OF CONDUCT AND CODE OF ETHICS FOR GOVERNMENT EMPLOYEES; IS ADEQUATE TRAINING CONDUCTED; ARE REQUIRED STATEMENTS FILED AND REVIEWED; IS ACTION TAKEN ON VIOLATIONS? (1%)

TOTAL

SATISFACTORY IS 75-100%

MARGINALLY SATISFACTORY IS 65-74%

UNSATISFACTORY IS LESS THAN 65%

APPENDIX B

ACTIVITY ACTIONS

<u>ID</u>	<u>QUANTITY</u> <u>P.O.</u>	<u>QUANTITY</u> <u>BPA ORD</u>	<u>QUANTITY</u> <u>DELIV ORD</u>	<u>IMPREST</u> <u>\$ VALUE</u>
1	469	362	20	30,945
2	15,689	24,084	849	543,354
3	2,247	15,036	6,819	122,518
4	9,016	6,371	691	311,100
5	1,827	1,460	0	52,798
6	1,945	888	1,071	65,692
7	199	337	685	19,502
8	564	1,354	775	4,236,879
9	1,557	1,670	1,857	53,135
10	737	832	1,545	100,840
11	327	622	191	29,381
12	182	135	118	0
13	494	1,594	597	37,080
14	38	0	16	0
15	80	298	18	10,296
16	41	48	36	0
17	28	11	2	0
18	10	34	4	0
19	535	19	54	0
20	9	34	1	0
21	167	96	13	0
22	31	41	4	0
23	42	123	4	0
24	38	66	7	0
25	278	156	152	0
26	253	342	53	0
27	276	0	123	0
28	123	201	54	0
29	315	119	102	0
30	113	5	43	0
31	31	71	8	0
32	76	201	10	0
33	297	1,186	682	0
34	38	201	0	0
35	313	481	48	0
36	0	0	0	0
37	12	21	4	0
38	33	35	13	0
39	71	94	0	0
40	15	277	37	0

<u>ID</u>	<u>QUANTITY</u> <u>P.O.</u>	<u>QUANTITY</u> <u>BPA ORD</u>	<u>QUANTITY</u> <u>DELIV ORD</u>	<u>IMPREST</u> <u>\$ VALUE</u>
41	0	0	0	0
42	79	18	10	0
43	91	0	0	0
44	42	89	57	0
45	24	12	12	0
46	337	0	37	0
47	40	10	22	0
48	0	395	43	0
49	58	90	91	0
50	154	0	6	0

APPENDIX C

DISCREPANCY COUNT

This appendix shows which activities were cited for various PMR discrepancies in 1989 and indicates the total number of occurrences for each discrepancy.

DISCREPANCY COUNT

ID --	MANUAL -----	CHAPTER -----	ACT ID -----
**** MANAGEMENT SUPPORT & CONTROL			
1	SUPARS	1.603-3	1
1	SUPARS	1.603-3	2
1	SUPARS	1.603-3	5
1	SUPARS	1.603-3	12
1	SUPARS	1.603-3	13
1	SUPARS	1.603-3	41
1	SUPARS	1.603-3	42
TOTAL OCCURENCES:			7
2	SUPARS	1.603-3(91)	13
2	SUPARS	1.603-3(91)	17
2	SUPARS	1.603-3(91)	31
TOTAL OCCURENCES:			3
3	SUPARS	1.603-3(93)	1
3	SUPARS	1.603-3(93)	2
TOTAL OCCURENCES:			2
4	SUPARS	1.607-1(90)	1
TOTAL OCCURENCES:			1
5	SUPARS	1.670	3
5	SUPARS	1.670	8
5	SUPARS	1.670	12
5	SUPARS	1.670	13
5	SUPARS	1.670	15
5	SUPARS	1.670	22
5	SUPARS	1.670	43
5	SUPARS	1.670	46
TOTAL OCCURENCES:			8
7	SUPARS	8.405(a)(ii)	12
TOTAL OCCURENCES:			1
8	SUPARS	1.670-3	3
8	SUPARS	1.670-3	15
8	SUPARS	1.670-3	17
TOTAL OCCURENCES:			3
9	SUPARS	10.004	7
TOTAL OCCURENCES:			1
10	SUPARS	12.402(b)	2
TOTAL OCCURENCES:			1
11	SUPARS	13.103	15
TOTAL OCCURENCES:			1

DISCREPANCY COUNT

ID	MANUAL	CHAPTER	ACT ID
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13	SUPARS	13.103(c)	2
13	SUPARS	13.103(c)	14
13	SUPARS	13.103(c)	40
13	SUPARS	13.103(c)	43
TOTAL OCCURENCES:		4	
14	SUPARS	13.103(c) (2)	12
14	SUPARS	13.103(c) (2)	16
TOTAL OCCURENCES:		2	
15	SUPARS	13.103(c) (2) (ii)	2
15	SUPARS	13.103(c) (2) (ii)	5
TOTAL OCCURENCES:		2	
16	SUPARS	13.103(c) (2) (iv)	2
TOTAL OCCURENCES:		1	
17	SUPARS	13.103(c) (2) (v)	12
17	SUPARS	13.103(c) (2) (v)	15
17	SUPARS	13.103(c) (2) (v)	28
17	SUPARS	13.103(c) (2) (v)	41
TOTAL OCCURENCES:		4	
18	SUPARS	13.103-1	1
18	SUPARS	13.103-1	3
18	SUPARS	13.103-1	13
18	SUPARS	13.103-1	15
TOTAL OCCURENCES:		4	
19	SUPARS	13.104(b) (1)	41
19	SUPARS	13.104(b) (1)	47
TOTAL OCCURENCES:		2	
20	SUPARS	13.104(b) (3)	2
TOTAL OCCURENCES:		1	
22	SUPARS	13.104-1(a)	15
22	SUPARS	13.104-1(a)	17
TOTAL OCCURENCES:		2	
23	SUPARS	13.104-1(b) (1)	12
23	SUPARS	13.104-1(b) (1)	15
23	SUPARS	13.104-1(b) (1)	15
23	SUPARS	13.104-1(b) (1)	41
TOTAL OCCURENCES:		4	
24	SUPARS	13.104-1(b) (2)	5
24	SUPARS	13.104-1(b) (2)	12
24	SUPARS	13.104-1(b) (2)	15
24	SUPARS	13.104-1(b) (2)	15

DISCREPANCY COUNT

ID	MANUAL	CHAPTER	ACT ID
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TOTAL OCCURENCES:		4	
25	SUPARS	13.104-1(b) (3)	3
25	SUPARS	13.104-1(b) (3)	5
25	SUPARS	13.104-1(b) (3)	7
25	SUPARS	13.104-1(b) (3)	12
25	SUPARS	13.104-1(b) (3)	16
25	SUPARS	13.104-1(b) (3)	17
25	SUPARS	13.104-1(b) (3)	22
25	SUPARS	13.104-1(b) (3)	40
25	SUPARS	13.104-1(b) (3)	44
TOTAL OCCURENCES:		9	
26	SUPARS	13.104-3	2
26	SUPARS	13.104-3	4
26	SUPARS	13.104-3	5
26	SUPARS	13.104-3	12
26	SUPARS	13.104-3	28
26	SUPARS	13.104-3	43
TOTAL OCCURENCES:		6	
27	SUPARS	13.104-3(b) (2)	7
TOTAL OCCURENCES:		1	
28	SUPARS	13.104-11(a) (1)	5
TOTAL OCCURENCES:		1	
29	SUPARS	13.105	17
TOTAL OCCURENCES:		1	
30	SUPARS	13.105(a)	1
30	SUPARS	13.105(a)	2
30	SUPARS	13.105(a)	3
30	SUPARS	13.105(a)	5
30	SUPARS	13.105(a)	15
30	SUPARS	13.105(a)	27
30	SUPARS	13.105(a)	43
30	SUPARS	13.105(a)	47
30	SUPARS	13.105(a)	48
TOTAL OCCURENCES:		9	
31	SUPARS	13.105(b)	1
31	SUPARS	13.105(b)	3
31	SUPARS	13.105(b)	5
31	SUPARS	13.105(b)	15
31	SUPARS	13.105(b)	43
31	SUPARS	13.105(b)	47
31	SUPARS	13.105(b)	48
TOTAL OCCURENCES:		7	

DISCREPANCY COUNT

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ID	MANUAL	CHAPTER	ACT ID
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32	SUPARS	13.105(c)	1
32	SUPARS	13.105(c)	2
32	SUPARS	13.105(c)	3
32	SUPARS	13.105(c)	5
32	SUPARS	13.105(c)	15
32	SUPARS	13.105(c)	27
32	SUPARS	13.105(c)	43
32	SUPARS	13.105(c)	47
32	SUPARS	13.105(c)	48
TOTAL OCCURENCES:		9	
33	SUPARS	13.105(d)	1
33	SUPARS	13.105(d)	2
33	SUPARS	13.105(d)	3
33	SUPARS	13.105(d)	5
33	SUPARS	13.105(d)	43
33	SUPARS	13.105(d)	48
TOTAL OCCURENCES:		6	
36	SUPARS	13.106(b) (1)	13
TOTAL OCCURENCES:		1	
37	SUPARS	13.106(b) (2) (ii)	13
TOTAL OCCURENCES:		1	
38	SUPARS	13.106-3	5
TOTAL OCCURENCES:		1	
39	SUPARS	13.107(f)	5
39	SUPARS	13.107(f)	5
TOTAL OCCURENCES:		2	
40	SUPARS	13.201(b) (1)	12
TOTAL OCCURENCES:		1	
41	SUPARS	13.201(b) (2)	2
41	SUPARS	13.201(b) (2)	3
TOTAL OCCURENCES:		2	
42	SUPARS	13.201(c) (3)	2
42	SUPARS	13.201(c) (3)	17
42	SUPARS	13.201(c) (3)	42
TOTAL OCCURENCES:		3	
43	SUPARS	13.205	2
43	SUPARS	13.205	14
TOTAL OCCURENCES:		2	
44	SUPARS	13.402(e) (2)	2
TOTAL OCCURENCES:		1	

DISCREPANCY COUNT

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ID --	MANUAL -----	CHAPTER -----	ACT ID -----
45	SUPARS	13.402(e)(4)(iii)	2
TOTAL OCCURENCES: 1			
46	SUPARS	13.405	2
46	SUPARS	13.405	2
TOTAL OCCURENCES: 2			
47	SUPARS	13.502	1
47	SUPARS	13.502	2
47	SUPARS	13.502	8
47	SUPARS	13.502	12
47	SUPARS	13.502	13
47	SUPARS	13.502	14
47	SUPARS	13.502	40
47	SUPARS	13.502	50
TOTAL OCCURENCES: 8			
48	SUPARS	13.502(d)(6)	5
48	SUPARS	13.502(d)(6)	8
TOTAL OCCURENCES: 2			
49	SUPARS	13.502-1	5
49	SUPARS	13.502-1	8
TOTAL OCCURENCES: 2			
51	SUPARS	13.502-1(f)	5
TOTAL OCCURENCES: 1			
52	SUPARS	13.505-5(b)	15
TOTAL OCCURENCES: 1			
53	SUPARS	13.104(b)(2)	4
53	SUPARS	13.104(b)(2)	43
TOTAL OCCURENCES: 2			
54	SUPARS	13.505-5(c)	15
TOTAL OCCURENCES: 1			
55	SUPARS	16.506(b)(90)(1)	2
55	SUPARS	16.506(b)(90)(1)	4
55	SUPARS	16.506(b)(90)(1)	7
TOTAL OCCURENCES: 3			
56	SUPARS	19.201(d)	13
TOTAL OCCURENCES: 1			
58	DODD	5500.7	5
TOTAL OCCURENCES: 1			

DISCREPANCY COUNT

ID --	MANUAL -----	CHAPTER -----	ACT ID -----
59	DFARS	4.671	12
TOTAL OCCURENCES: 1			
60	DFARS	19.2	4
TOTAL OCCURENCES: 1			
61	DFARS	19.201(2)	4
TOTAL OCCURENCES: 1			
62	DFARS	204.6	7
TOTAL OCCURENCES: 1			
63	DFARS	214.4	5
TOTAL OCCURENCES: 1			
64	DODMS	5010.16C	1
TOTAL OCCURENCES: 1			
65	DFARS	219.201	2
65	DFARS	219.201	12
65	DFARS	219.201	13
TOTAL OCCURENCES: 3			
66	DFARS	219.501(c)	4
TOTAL OCCURENCES: 1			
67	FAR	3.601	5
TOTAL OCCURENCES: 1			
68	FAR	7.4	3
68	FAR	7.4	25
TOTAL OCCURENCES: 2			
70	FAR	9	5
TOTAL OCCURENCES: 1			
71	FAR	10.002	5
71	FAR	10.002	12
71	FAR	10.002	24
71	FAR	10.002	43
TOTAL OCCURENCES: 4			
72	FAR	10.004	5
TOTAL OCCURENCES: 1			
74	FAR	10.004(b)(1)	2
TOTAL OCCURENCES: 1			
75	SUPARS	13.404(a)(2)	3
TOTAL OCCURENCES: 1			

DISCREPANCY COUNT

ID --	MANUAL -----	CHAPTER -----	ACT ID -----
76	FAR	13.702	5
TOTAL OCCURENCES: 1			
77	FAR	14.4	5
TOTAL OCCURENCES: 1			
78	SUPARS	13.404 (2)	3
TOTAL OCCURENCES: 1			
79	FAR	32.702	2
TOTAL OCCURENCES: 1			
80	NARSUP	4.693	7
TOTAL OCCURENCES: 1			
81	NARSUP	4.693-28	1
TOTAL OCCURENCES: 1			
82	NARSUP	204.693	12
TOTAL OCCURENCES: 1			
83	NAVSUPINST	4200.81	9
TOTAL OCCURENCES: 1			
84	NAVSUPINST	4200.84	9
84	NAVSUPINST	4200.84	10
84	NAVSUPINST	4200.84	49
TOTAL OCCURENCES: 3			
85	NAVSUPINST	4200.85	9
85	NAVSUPINST	4200.85	49
TOTAL OCCURENCES: 2			
86	NAVCOMPT	042350.2A	11
TOTAL OCCURENCES: 1			
87	NAVCOMPT	042351.4-F	1
87	NAVCOMPT	042351.4-F	8
TOTAL OCCURENCES: 2			
88	SECNAVINST	4200.23A	2
88	SECNAVINST	4200.23A	5
TOTAL OCCURENCES: 2			
89	SECNAVINST	5070.4	5
TOTAL OCCURENCES: 1			
91	SECNAVINST	5231.1B	5
TOTAL OCCURENCES: 1			

DISCREPANCY COUNT

ID --	MANUAL -----	CHAPTER -----	ACT ID -----
92	SECNAVINST	5370.2H	5
92	SECNAVINST	5370.2H	21
92	SECNAVINST	5370.2H	24
92	SECNAVINST	5370.2H	25
TOTAL OCCURENCES:		4	
93	SUPARS	1.603-3(93) (a)	5
TOTAL OCCURENCES:		1	
101	FAR	13.106(b) (1)	13
TOTAL OCCURENCES:		1	
112	SUPARS	13.502(c)	3
TOTAL OCCURENCES:		1	
116	SUPARS	13.402(e)	2
TOTAL OCCURENCES:		1	
122	SUPARS	7.000-91	12
122	SUPARS	7.000-91	15
122	SUPARS	7.000-91	41
122	SUPARS	7.000-91	47
TOTAL OCCURENCES:		4	
131	SUPARS	13.507(d)	40
TOTAL OCCURENCES:		1	
132	SUPARS	13.106(a) (1)	28
TOTAL OCCURENCES:		1	
141	FAR	13.105	32
TOTAL OCCURENCES:		1	
148	SUPARS	13.502(b)	8
TOTAL OCCURENCES:		1	
149	SUPARS	13.502(d) (2)	8
TOTAL OCCURENCES:		1	
150	SUPARS	13.502(d) (8)	8
TOTAL OCCURENCES:		1	
158	NAPS	1.670-3	9
158	NAPS	1.670-3	49
TOTAL OCCURENCES:		2	
169	NAVSUPINST	4200.85(2) (1) (17)	21
TOTAL OCCURENCES:		1	

DISCREPANCY COUNT

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ID	MANUAL	CHAPTER	ACT ID
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170	NAVSUPINST	4200.85(2)(1)(8a)	24
170	NAVSUPINST	4200.85(2)(1)(8a)	25
TOTAL OCCURENCES:		2	
175	NAVSUPINST	4200.85(2)(1)(4c)	18
175	NAVSUPINST	4200.85(2)(1)(4c)	24
TOTAL OCCURENCES:		2	
176	NAVSUPINST	4200.85(2)(1)(6a)	21
176	NAVSUPINST	4200.85(2)(1)(6a)	24
TOTAL OCCURENCES:		2	
178	NAVSUPINST	4200.85(3)	21
178	NAVSUPINST	4200.85(3)	39
TOTAL OCCURENCES:		2	
179	NAVSUPINST	4200.85(2)(5)(2)	21
TOTAL OCCURENCES:		1	
180	NAVSUPINST	4200.85(2)(5)(3)	21
TOTAL OCCURENCES:		1	
195	SUPARS	13.104-5(a)	27
TOTAL OCCURENCES:		1	
203	DFARS	4.6	31
TOTAL OCCURENCES:		1	
204	DFARS	4.671	34
TOTAL OCCURENCES:		1	
205	DFARS	4.672	34
TOTAL OCCURENCES:		1	
206	SUPARS	13.109-90	36
TOTAL OCCURENCES:		1	
207	FAR	52.232.25	36
TOTAL OCCURENCES:		1	
210	SUPARS	1.603-3(94)	43
210	SUPARS	1.603-3(94)	48
TOTAL OCCURENCES:		2	
211	SUPARS	13.104(a)	44
TOTAL OCCURENCES:		1	
212	SUPARS	13.104-6	47
TOTAL OCCURENCES:		1	

DISCREPANCY COUNT

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ID	MANUAL	CHAPTER	ACT ID
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**** REQUIREMENTS DISCIPLINE			
6	NARSUP	8.9102(b)	4
TOTAL OCCURENCES:			1
11	SUPARS	13.103	4
TOTAL OCCURENCES:			1
12	SUPARS	13.103(a)	1
12	SUPARS	13.103(a)	2
12	SUPARS	13.103(a)	3
12	SUPARS	13.103(a)	4
12	SUPARS	13.103(a)	5
12	SUPARS	13.103(a)	7
12	SUPARS	13.103(a)	12
12	SUPARS	13.103(a)	17
12	SUPARS	13.103(a)	27
12	SUPARS	13.103(a)	43
12	SUPARS	13.103(a)	44
TOTAL OCCURENCES:			11
24	SUPARS	13.104-1(b) (2)	11
TOTAL OCCURENCES:			1
26	SUPARS	13.104-3	11
26	SUPARS	13.104-3	27
TOTAL OCCURENCES:			2
29	SUPARS	13.105	6
TOTAL OCCURENCES:			1
30	SUPARS	13.105(a)	14
TOTAL OCCURENCES:			1
31	SUPARS	13.105(b)	14
TOTAL OCCURENCES:			1
32	SUPARS	13.105(c)	14
TOTAL OCCURENCES:			1
33	SUPARS	13.105(d)	35
TOTAL OCCURENCES:			1
68	FAR	7.4	24
TOTAL OCCURENCES:			1
69	FAR	8	3
69	FAR	8	27
TOTAL OCCURENCES:			2

DISCREPANCY COUNT

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ID	MANUAL	CHAPTER	ACT ID
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71	FAR	10.002	11
TOTAL OCCURENCES: 1			
85	NAVSUPINST	4200.85	9
85	NAVSUPINST	4200.85	10
85	NAVSUPINST	4200.85	49
TOTAL OCCURENCES: 3			
94	FAR	8.001	1
94	FAR	8.001	2
94	FAR	8.001	4
94	FAR	8.001	5
94	FAR	8.001	7
94	FAR	8.001	9
94	FAR	8.001	12
94	FAR	8.001	15
94	FAR	8.001	17
94	FAR	8.001	21
94	FAR	8.001	24
94	FAR	8.001	43
94	FAR	8.001	44
TOTAL OCCURENCES: 13			
119	SUPARS	13.104-1	4
TOTAL OCCURENCES: 1			
120	SUPARS	13.104-3(b)	4
TOTAL OCCURENCES: 1			
141	FAR	13.105	6
TOTAL OCCURENCES: 1			
142	FAR	8.404-3	7
142	FAR	8.404-3	15
142	FAR	8.404-3	21
142	FAR	8.404-3	49
TOTAL OCCURENCES: 4			
143	FAR	8.606	7
143	FAR	8.606	15
143	FAR	8.606	21
143	FAR	8.606	49
TOTAL OCCURENCES: 4			
169	NAVSUPINST	4200.85(2)(1)(17)	20
169	NAVSUPINST	4200.85(2)(1)(17)	25
TOTAL OCCURENCES: 2			
176	NAVSUPINST	4200.85(2)(1)(6a)	19
176	NAVSUPINST	4200.85(2)(1)(6a)	24

DISCREPANCY COUNT

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ID	MANUAL	CHAPTER	ACT ID
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TOTAL OCCURENCES:		2	
181	NAVSUPINST	4200.85(2)(1)(4a)	21
181	NAVSUPINST	4200.85(2)(1)(4a)	24
TOTAL OCCURENCES:		2	
186	NAVSUPINST	4200.85(2)(2)(10)	24
TOTAL OCCURENCES:		1	
193	SUPARS	13.104-1(b)	26
TOTAL OCCURENCES:		1	
196	SUPARS	13.104-4(b)(1)	27
TOTAL OCCURENCES:		1	

DISCREPANCY COUNT

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ID	MANUAL	CHAPTER	ACT ID
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**** PRICING CONSIDERATIONS			
5	SUPARS	1.670	13
5	SUPARS	1.670	15
TOTAL OCCURENCES:		2	
35	SUPARS	13.106(b)	2
35	SUPARS	13.106(b)	3
35	SUPARS	13.106(b)	8
TOTAL OCCURENCES:		3	
47	SUPARS	13.502	13
47	SUPARS	13.502	15
TOTAL OCCURENCES:		2	
50	SUPARS	13.106(b) (2)	5
50	SUPARS	13.106(b) (2)	8
50	SUPARS	13.106(b) (2)	12
50	SUPARS	13.106(b) (2)	31
TOTAL OCCURENCES:		4	
85	NAVSUPINST	4200.85	10
TOTAL OCCURENCES:		1	
96	FAR	15.805-4	1
96	FAR	15.805-4	7
TOTAL OCCURENCES:		2	
97	FAR	15.807	1
97	FAR	15.807	7
TOTAL OCCURENCES:		2	
98	FAR	15.805	1
TOTAL OCCURENCES:		1	
100	SUPARS	8.405(b)	2
100	SUPARS	8.405(b)	13
100	SUPARS	8.405(b)	26
100	SUPARS	8.405(b)	44
TOTAL OCCURENCES:		4	
133	SUPARS	13.106	13
133	SUPARS	13.106	15
TOTAL OCCURENCES:		2	
144	FAR	15.808(a)	7
TOTAL OCCURENCES:		1	
151	SUPARS	13.106(b) (3)	8
TOTAL OCCURENCES:		1	

DISCREPANCY COUNT

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ID	MANUAL	CHAPTER	ACT ID
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171	NAVSUPINST	4200.85(1)(1)(3b)	21
TOTAL OCCURENCES:		1	

DISCREPANCY COUNT

ID --	MANUAL -----	CHAPTER -----	ACT ID -----
**** COMPETITION			
16	SUPARS	13.103(c)(2)(iv)	1
TOTAL OCCURENCES:		1	
35	SUPARS	13.106(b)	1
35	SUPARS	13.106(b)	2
35	SUPARS	13.106(b)	6
35	SUPARS	13.106(b)	8
TOTAL OCCURENCES:		4	
36	SUPARS	13.106(b)(1)	2
36	SUPARS	13.106(b)(1)	3
36	SUPARS	13.106(b)(1)	5
TOTAL OCCURENCES:		3	
37	SUPARS	13.106(b)(2)(ii)	2
TOTAL OCCURENCES:		1	
101	FAR	13.106(b)(1)	1
TOTAL OCCURENCES:		1	
133	SUPARS	13.106	5
TOTAL OCCURENCES:		1	
152	SUPARS	13.106(b)(1)(i)	8
TOTAL OCCURENCES:		1	
153	SUPARS	13.106(b)(1)(ii)	8
TOTAL OCCURENCES:		1	
154	SUPARS	13.107(f)(4)	8
TOTAL OCCURENCES:		1	
155	SUPARS	13.107(f)(1)	8
TOTAL OCCURENCES:		1	
156	SUPARS	8.404-2	8
TOTAL OCCURENCES:		1	

DISCREPANCY COUNT

ID ---	MANUAL -----	CHAPTER -----	ACT ID -----
**** CONTRACTING ADMINISTRATION			
47	SUPARS	13.502	1
47	SUPARS	13.502	27
TOTAL OCCURENCES:			2
105	NAVSEAINST	4000.6	1
TOTAL OCCURENCES:			1
106	SUPARS	13.503(a)	1
106	SUPARS	13.503(a)	2
106	SUPARS	13.503(a)	5
106	SUPARS	13.503(a)	7
106	SUPARS	13.503(a)	8
106	SUPARS	13.503(a)	12
106	SUPARS	13.503(a)	15
106	SUPARS	13.503(a)	26
106	SUPARS	13.503(a)	31
106	SUPARS	13.503(a)	43
106	SUPARS	13.503(a)	50
TOTAL OCCURENCES:			11
107	SUPARS	13.504(b)(1)	1
107	SUPARS	13.504(b)(1)	2
107	SUPARS	13.504(b)(1)	7
107	SUPARS	13.504(b)(1)	12
107	SUPARS	13.504(b)(1)	15
107	SUPARS	13.504(b)(1)	43
107	SUPARS	13.504(b)(1)	50
TOTAL OCCURENCES:			7
108	NAVSUPINST	4205.3	1
108	NAVSUPINST	4205.3	3
108	NAVSUPINST	4205.3	7
108	NAVSUPINST	4205.3	10
TOTAL OCCURENCES:			4
109	DFARS	204.7004-4	2
TOTAL OCCURENCES:			1
110	SUPARS	13.507	1
TOTAL OCCURENCES:			1
111	SUPARS	13.104-9(b)(1)	1
TOTAL OCCURENCES:			1
113	DFARS	213.507(a)(2)	1
TOTAL OCCURENCES:			1
134	DFARS	213.503	5

DISCREPANCY COUNT

<u>ID</u>	<u>MANUAL</u>	<u>CHAPTER</u>	<u>ACT ID</u>
TOTAL OCCURENCES:		1	
135 SUPARS		13.504(b) (1)	5
TOTAL OCCURENCES:		1	
145 SUPARS		13.503(b)	7
TOTAL OCCURENCES:		1	
146 SUPARS		13.503(d) (1)	7
TOTAL OCCURENCES:		1	
157 SUPARS		13.503(d)	8
TOTAL OCCURENCES:		1	
159 DFARS		204.7109	9
TOTAL OCCURENCES:		1	
160 FAR		52.216-18	9
TOTAL OCCURENCES:		1	
182 NAVSUPINST		4200.85(2) (5) (4)	21
TOTAL OCCURENCES:		1	
183 NAVSUPINST		4200.85(2) (5) (5)	21
TOTAL OCCURENCES:		1	
197 SUPARS		13.104-6(c) (1)	28
TOTAL OCCURENCES:		1	

DISCREPANCY COUNT

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ID --	MANUAL -----	CHAPTER -----	ACT ID -----
**** PROCEDURAL ASPECTS OF S/PURCH			
19	SUPARS	13.104(b)(1)	2
19	SUPARS	13.104(b)(1)	26
TOTAL OCCURENCES:			2
22	SUPARS	13.104-1(a)	26
TOTAL OCCURENCES:			1
25	SUPARS	13.104-1(b)(3)	11
TOTAL OCCURENCES:			1
28	SUPARS	13.104-11(a)(1)	35
TOTAL OCCURENCES:			1
34	DFARS	4.802-71(a)(2)	3
TOTAL OCCURENCES:			1
39	SUPARS	13.107(f)	35
TOTAL OCCURENCES:			1
41	SUPARS	13.201(b)(2)	4
41	SUPARS	13.201(b)(2)	5
41	SUPARS	13.201(b)(2)	14
41	SUPARS	13.201(b)(2)	15
TOTAL OCCURENCES:			4
43	SUPARS	13.205	4
43	SUPARS	13.205	28
TOTAL OCCURENCES:			2
46	SUPARS	13.405	5
46	SUPARS	13.405	6
TOTAL OCCURENCES:			2
47	SUPARS	13.502	4
47	SUPARS	13.502	4
47	SUPARS	13.502	15
47	SUPARS	13.502	28
47	SUPARS	13.502	35
47	SUPARS	13.502	44
47	SUPARS	13.502	46
TOTAL OCCURENCES:			7
48	SUPARS	13.502(d)(6)	32
TOTAL OCCURENCES:			1
52	SUPARS	13.505-5(b)	4
52	SUPARS	13.505-5(b)	47
TOTAL OCCURENCES:			2

DISCREPANCY COUNT

ID --	MANUAL -----	CHAPTER -----	ACT ID -----
73	SUPARS	13.505-6(b) (1)	2
73	SUPARS	13.505-6(b) (1)	3
73	SUPARS	13.505-6(b) (1)	4
TOTAL OCCURENCES:		3	
84	NAVSUPINST	4200.84	21
TOTAL OCCURENCES:		1	
85	NAVSUPINST	4200.85	9
85	NAVSUPINST	4200.85	10
TOTAL OCCURENCES:		2	
90	SUPARS	13.505-5	3
TOTAL OCCURENCES:		1	
95	DFARS	4.802-70	3
95	DFARS	4.802-70	47
TOTAL OCCURENCES:		2	
99	DFARS	4.804-1	3
TOTAL OCCURENCES:		1	
100	SUPARS	8.405(b)	13
TOTAL OCCURENCES:		1	
102	FAR	4.85	3
TOTAL OCCURENCES:		1	
103	SUPARS	13.104-5	3
103	SUPARS	13.104-5	5
103	SUPARS	13.104-5	12
103	SUPARS	13.104-5	15
103	SUPARS	13.104-5	27
103	SUPARS	13.104-5	40
103	SUPARS	13.104-5	47
TOTAL OCCURENCES:		7	
106	SUPARS	13.503(a)	27
106	SUPARS	13.503(a)	42
106	SUPARS	13.503(a)	46
TOTAL OCCURENCES:		3	
107	SUPARS	13.504(b) (1)	46
TOTAL OCCURENCES:		1	
109	DFARS	204.7004-4	2
109	DFARS	204.7004-4	37
109	DFARS	204.7004-4	42
TOTAL OCCURENCES:		3	

DISCREPANCY COUNT
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ID --	MANUAL -----	CHAPTER -----	ACT ID -----
110	SUPARS	13.507	2
110	SUPARS	13.507	8
110	SUPARS	13.507	12
110	SUPARS	13.507	13
110	SUPARS	13.507	15
110	SUPARS	13.507	26
110	SUPARS	13.507	47
110	SUPARS	13.507	48
TOTAL OCCURENCES:		8	
111	SUPARS	13.104-9(b) (1)	28
TOTAL OCCURENCES:		1	
113	DFARS	213.507(a) (2)	12
113	DFARS	213.507(a) (2)	36
113	DFARS	213.507(a) (2)	39
113	DFARS	213.507(a) (2)	47
TOTAL OCCURENCES:		4	
114	SUPARS	13.505-5(b) (1)	2
TOTAL OCCURENCES:		1	
115	SUPARS	8.405-2	2
TOTAL OCCURENCES:		1	
117	DFARS	204.7003-1	2
117	DFARS	204.7003-1	15
TOTAL OCCURENCES:		2	
118	DFARS	213.507(a) (1)	2
118	DFARS	213.507(a) (1)	8
118	DFARS	213.507(a) (1)	9
118	DFARS	213.507(a) (1)	13
118	DFARS	213.507(a) (1)	15
118	DFARS	213.507(a) (1)	21
118	DFARS	213.507(a) (1)	26
118	DFARS	213.507(a) (1)	32
118	DFARS	213.507(a) (1)	35
118	DFARS	213.507(a) (1)	46
118	DFARS	213.507(a) (1)	48
118	DFARS	213.507(a) (1)	49
TOTAL OCCURENCES:		12	
121	DFARS	4.802-71(a) (1)	3
121	DFARS	4.802-71(a) (1)	47
TOTAL OCCURENCES:		2	
122	SUPARS	7.000-91	2
122	SUPARS	7.000-91	26

DISCREPANCY COUNT

ID	MANUAL	CHAPTER	ACT ID
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TOTAL OCCURENCES:			2
130	SUPARS	13.502(d)(3)	4
TOTAL OCCURENCES:			1
131	SUPARS	13.507(d)	4
TOTAL OCCURENCES:			1
132	SUPARS	13.106(a)(1)	4
132	SUPARS	13.106(a)(1)	13
TOTAL OCCURENCES:			2
133	SUPARS	13.106	15
TOTAL OCCURENCES:			1
137	SUPARS	13.201(a)	5
TOTAL OCCURENCES:			1
138	SUPARS	13.402(b)	5
TOTAL OCCURENCES:			1
139	SUPARS	13.403(a)(3)	5
TOTAL OCCURENCES:			1
140	DFARS	214.802-71(a)(2)	5
TOTAL OCCURENCES:			1
147	SUPARS	13.204(d)	7
147	SUPARS	13.204(d)	15
147	SUPARS	13.204(d)	28
147	SUPARS	13.204(d)	31
147	SUPARS	13.204(d)	35
147	SUPARS	13.204(d)	40
147	SUPARS	13.204(d)	42
TOTAL OCCURENCES:			7
161	SUPARS	13.104-5(a)	11
TOTAL OCCURENCES:			1
162	SUPARS	13.201(c)(2)	11
TOTAL OCCURENCES:			1
163	SUPARS	13.104-5(a)(2)	11
163	SUPARS	13.104-5(a)(2)	46
TOTAL OCCURENCES:			2
164	DFARS	204.7004	12
TOTAL OCCURENCES:			1
165	SUPARS	13.104-6(b)(2)	15

DISCREPANCY COUNT

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ID --	MANUAL -----	CHAPTER -----	ACT ID -----
TOTAL OCCURENCES:			1
166	SUPARS	13.104(b)	15
166	SUPARS	13.104(b)	47
TOTAL OCCURENCES:			2
167	SUPARS	13.205-2	22
TOTAL OCCURENCES:			1
168	SUPARS	13.205-1	22
TOTAL OCCURENCES:			1
169	NAVSUPINST	4200.85(2)(1)(17)	24
TOTAL OCCURENCES:			1
171	NAVSUPINST	4200.85(1)(1)(3b)	25
TOTAL OCCURENCES:			1
172	NAVSUPINST	4200.85(2)(2)(7)	21
172	NAVSUPINST	4200.85(2)(2)(7)	25
TOTAL OCCURENCES:			2
173	SUPARS	13.104-6(a)(3)	16
TOTAL OCCURENCES:			1
174	NAVSUPINST	4200.85(2)(2)(11)	18
TOTAL OCCURENCES:			1
176	NAVSUPINST	4200.85(2)(1)(6a)	21
TOTAL OCCURENCES:			1
177	NAVSUPINST	4200.85(2)(1)(10)	20
177	NAVSUPINST	4200.85(2)(1)(10)	24
TOTAL OCCURENCES:			2
178	NAVSUPINST	4200.85(3)	24
TOTAL OCCURENCES:			1
184	NAVSUPINST	4200.85(2)(2)(1b)	21
TOTAL OCCURENCES:			1
185	NAVSUPINST	4200.85(2)(2)(5a)	21
TOTAL OCCURENCES:			1
186	NAVSUPINST	4200.85(2)(2)(10)	21
TOTAL OCCURENCES:			1
187	NAVSUPINST	4200.85(2)(1)(11)	21
187	NAVSUPINST	4200.85(2)(1)(11)	24
TOTAL OCCURENCES:			2

DISCREPANCY COUNT

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ID	MANUAL	CHAPTER	ACT ID
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191	NAVSUPINST	4200.85(2)(2)(5)	24
	TOTAL OCCURENCES:	1	
192	NAVSUPINST	4200.85(2)(2)(4h)	24
	TOTAL OCCURENCES:	1	
194	SUPARS	13.104-6(b)(2)	26
	TOTAL OCCURENCES:	1	
195	SUPARS	13.104-5(a)	27
	TOTAL OCCURENCES:	1	
198	FAR	52.213-2	28
	TOTAL OCCURENCES:	1	
199	SUPARS	13.104-11(a)(2)	28
	TOTAL OCCURENCES:	1	
200	DFARS	13.507(a)(1)	28
	TOTAL OCCURENCES:	1	
201	SUPARS	13.502(a)	28
	TOTAL OCCURENCES:	1	
202	SUPARS	13.507(d)(3)	28
	TOTAL OCCURENCES:	1	
208	FAR	13.203-1(j)(5)	38
	TOTAL OCCURENCES:	1	
209	NAVSUPINST	4200.85(2)(2)(4d)	39
	TOTAL OCCURENCES:	1	
212	SUPARS	13.104-6	44
212	SUPARS	13.104-6	48
	TOTAL OCCURENCES:	2	

LIST OF REFERENCES

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2. Lyons, R.D., and Sullivan, T.J., The Procurement Management Review Program, DoD Project No. 1013, 20 December 1961.
3. Procurement Management Review Program, Office of the Assistant Secretary of Defense (I&L) Procurement Management Review Directorate, January 1969.
4. Supply Acquisition Regulation Supplement, Naval Supply Systems Command, May 1987.

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